

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 21-cr-20747

Honorable Terrence G. Berg

vs.

D-1 CESAR MATIA GARCIA, a.k.a. “Cee,”

D-2 KYLE ALLAN KENNARD,

a.k.a. “Whopp Dogg,” a.k.a. “Dogg,” a.k.a., “Whopp,”

D-3 LEO BRADLEY TODD, a.k.a. “LWay,” a.k.a. “Sway,”

D-4 CORDERALLA PIERA CAMPBELL, a.k.a. “Chi,” a.k.a. “Teezy,”

D-5 PERISE JAAMAR SMITH, a.k.a. “P,”

D-6 JALIN DEANDRE GARDNER, a.k.a. “Styles,” a.k.a. “Stizie,”

D-7 MARCOS ANTONIO MONARREZ,

D-8 ISMAEL RODRIGUEZ,

D-9 KAPRI FATIMA OLDHAM,

D-10 RAMIKA SHANEE BOAZE,

D-11 BRIANNA TESHARRI BLAKE,

D-12 DARRION LANAE WASHINGTON, a.k.a. “Hannah,”

D-13 CATEASHA LATREASE WELLS-IVY,

Defendants.

First Forfeiture Bill of Particulars

The United States, by and through its counsel, submits this First Forfeiture Bill of Particulars, pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure

to supplement and clarify the forfeiture allegations contained in the Indictment and to provide notice of specific property the government intends to forfeit upon conviction.

The allegations set forth in the Indictment are re-alleged and incorporated herein by this reference for the purpose of alleging forfeiture pursuant to Federal Rule of Criminal Procedure 32.2(a), 18 U.S.C. § 982(a)(1) and 21 U.S.C. § 853(a).

As a result of violating the offenses set forth in Count One of the Indictment, the defendant(s) shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a):

- a) Any property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the violation of 21 U.S.C. §§ 841 and 846; and
- b) Any property, real or personal, used, or intended to be used, in any manner, to commit, or to facilitate the commission of, the violation of 21 U.S.C. §§ 841 and 846.

As a result of violating the offenses set forth in Count Two of the Indictment, the defendant(s) shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in the offense, or any property traceable to such property. Such property includes, but is not limited to:

- \$10,416.00 U.S. Currency;
- \$31,320.00 U.S. Currency;
- \$3,200.00 U.S. Currency;
- \$9,604.00 U.S. Currency;
- \$1,900.00 U.S. Currency;
- 18kt White Gold Diamond Encrusted Day-Date II Rolex Automatic Watch;

- 18kt Yellow Gold and Stainless Steel Diamond Encrusted DateJust Rolex Automatic Watch;
- \$30,000.00 U.S. Currency;
- 10k White Gold 22" Diamond Necklace with 10k White Gold "TC" Diamond Pendant;
- 10k Rose Gold 21" Diamond Necklace; and
- \$1,294.00 U.S. Currency.

This Forfeiture Bill of Particulars is also filed to comply with the provisions of 18 U.S.C. § 983(a)(3), and the government reserves its right to file a civil forfeiture complaint regarding the identified property, if necessary, at the conclusion of this criminal action.

This notice does not limit the government from seeking the forfeiture of additional specific property, including substitute assets, or limit the government from seeking the imposition of a forfeiture money judgment.

Respectfully submitted,

Dawn N. Ison
United States Attorney

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Dated: September 22, 2022

Certification of Service

I hereby certify that on September 22, 2022, the foregoing document was electronically filed using the ECF system which will send notification of such filing to all ECF participants.

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